

Message

From: Dughri, Darem [darem.dughri@walgreens.com]
Sent: 10/22/2012 8:49:21 PM
To: Polster, Tasha [tasha.polster@walgreens.com]
Subject: GFD Ppt
Attachments: CSActionPlan_vF.pptx; CSActionPlan_store_6.11.12.pptx

Tasha,

I have attached two Powerpoints to this email. The first is what we presented to Market and District leaders (which is not posted). The second Powerpoint is what we provided to the store (which is available on StoreNet under the GFD policy located under Additional Resources on page 7). If you have any questions please let me know.

Thanks,
Darem

PLAINTIFFS TRIAL
EXHIBIT
P-25631_00001



Controlled Substance Action Plan

June 11th, 2012

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

HIGHLY CONFIDENTIAL

WAGMDL00066601



Agenda

- Overview
- Review updated policies & procedures
- Exception store visits
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Overview

- Due to recent action taken by the DEA, select policies and procedures have been updated to ensure our pharmacists and stores are compliant when dispensing controlled substances.
- Corresponding enhancements include:
 - Update to the Good Faith Dispensing Guidelines
 - Revised Ordering Procedures for Controlled Substances
 - Drug Utilization Review Enhancements
- Exception stores have been identified that may require additional action by Market and District leadership.

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



- Overview
- Review updated policies & procedures
- Exception store visits
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Good Faith Dispensing Policy

- The Good Faith Dispensing Policy has been updated to provide Pharmacists additional resources for making decisions when dispensing controlled substance prescriptions.
- The following components have been updated:
 - Prescription Validation Procedures
 - Roles and Responsibilities of each pharmacy team member
- Pathway to Good Faith Dispensing Policy
 - *Storenet > RxOps > Pharmacy Policies and Procedures > Filling Prescriptions > Controlled Substance Prescriptions and Good Faith Dispensing*

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Validation Procedures for Good Faith Dispensing (GFD)



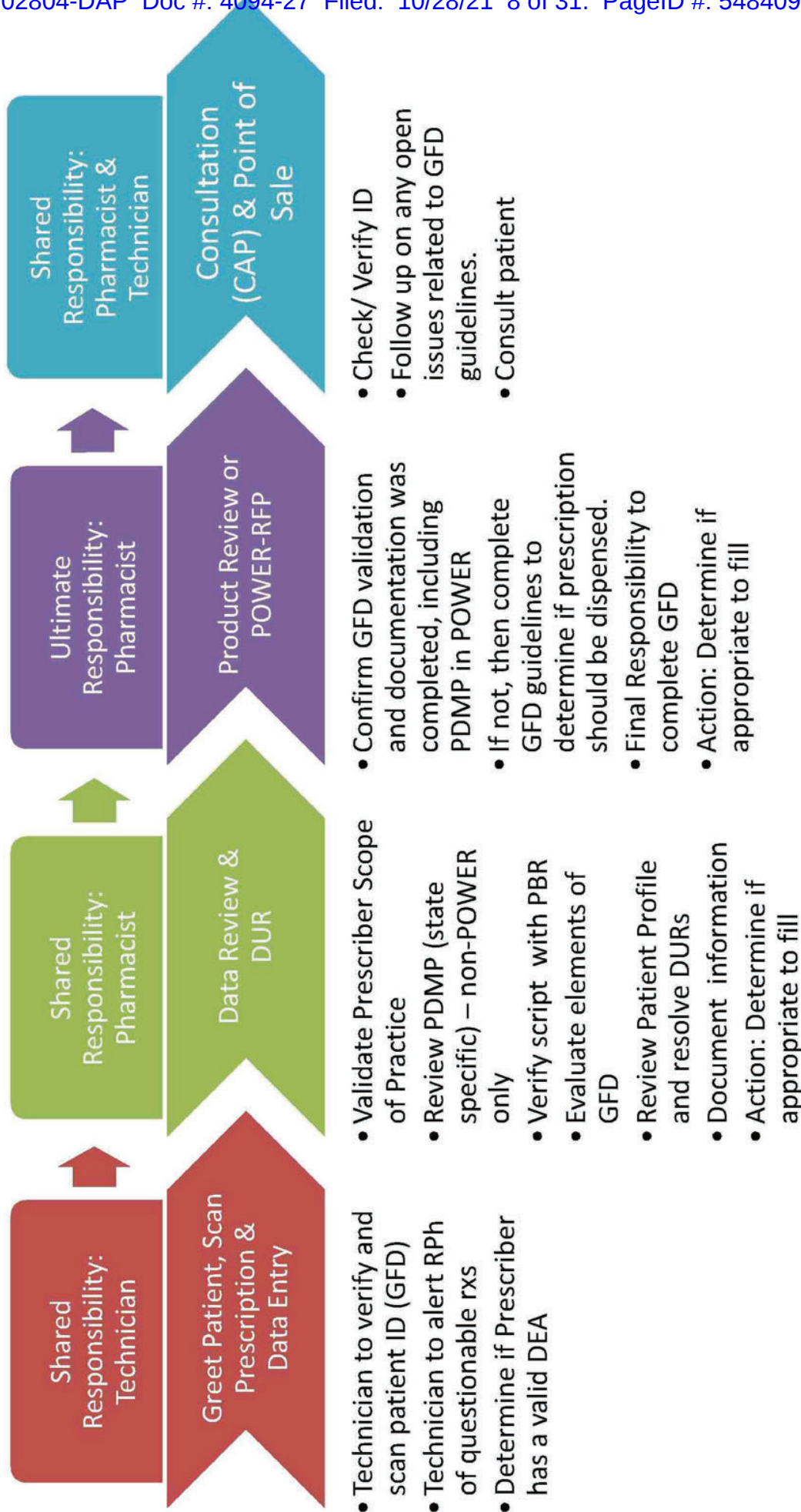
Validation Tools

- 1. Patient ID**
 - Verify and Document ID if the patient doesn't have a relationship with the pharmacy
 - Follow state specific guidelines
- 2. Prescriber**
 - Verify Prescriber DEA number
 - Use DEA website if necessary
- 3. PDMP**
 - Utilize to obtain additional information to help determine validity of prescription
 - State specific
- 4. Data/DUR Review**
 - Review patient profile to resolve and document any associated DURs
- 5. Evaluate GFD guidelines**
 - Ensure usual course of professional practice
 - Verify noticeable trends with prescribers or patients
 - Verify prescriptions have not been altered or forged

Actions after Validation

- 6. Document**
 - Document all efforts used to validate good faith dispensing
- 7. RPh Action**
 - Determine how to proceed after using GFD guidelines:
 - Dispense
 - Not valid to dispense
 - Refuse to dispense
- 8. Notify DEA**
 - Notify local DEA office of refusal to fill if prescription is forged, altered or issued outside of usual course of professional practice

Everyone Plays a Role in the GFD Process



Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Ordering Controlled Substances

- Controlled Substance Ordering procedures have been updated to minimize risk.
- The following changes have been implemented:
 - Manual Orders to DC and Cardinal will no longer be accepted.
 - All Controlled Substance orders will be required to be processed through SIMS, including requests for specific manufacturers
 - *StoreNet > SIMS > Rx Inventory Management > Ordering > Controlled Drugs > Ordering Specific Manufacturer*
 - Maximum Ordering Quantities
 - Store specific order limits
 - Chainwide order limits
 - Controlled Substance Order Quantity Override Form
 - The Pharmacy Supervisor will be required to evaluate and complete the override form for orders exceeding the maximum quantity only
 - *RxS and DM StoreNet Homepage > Inventory & Shrink > Controlled Substance Order Quantity Override Form*

Enhanced Drug Utilization Review



- A DUR enhancement has been made to alert pharmacists to review a patient's profile and utilize Good Faith Dispensing procedures when dispensing select controlled substances.
 - A **Major DUR** will flag when a patient has been prescribed medications, that in combination, have a high potential for abuse.
 - The following message will appear to the pharmacist: *"A strong association appears to exist between illicit use of Carisoprodol in combination with narcotic analgesics such as oxycodone and benzodiazepines such as alprazolam....."*
- The pharmacist completing the DUR must then adhere to the Good Faith Dispensing policy.



- Overview
- Review updated policies & procedures
- Exception store visits
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Exception Stores



- Walgreens has taken a proactive approach to minimize risk for targeted stores that may be impacted in the future
- District and Market Leadership including Loss Prevention will be provided a list of exception stores
- Exception stores were identified using the following criteria:
 - Controlled Substance Volume and Trending
 - Proportionality to total business
 - Payment method
- Working together, District LP Managers and Pharmacy Supervisors for these exceptions stores are required to complete a Focus on Compliance (FOC) Pain Management survey
 - Information gathering tool to better understand current practices
 - Results will be used to develop future best practices for all stores

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



- Overview
- Review updated policies & procedures
- Exception store visits
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Future Enhancements

- We will be developing additional tools to assist in our compliance efforts. These include:
 - Index Reporting
 - Updated Inventory Dashboard
 - Additional inventory system controls (SIMS)
 - Controlled Substance investigation process
 - IT enhancements to streamline current manual processes
 - Good Faith Dispensing PPL Policy Acknowledgement and PPL Training

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



- Overview
- Review updated policies & procedures
- Exception store visits
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Call to Action



- All District Leaders should:
 - Reinforce the following information with all pharmacy team members:
 - Updated Good Faith Dispensing Policy
 - Updated controlled substance ordering procedures
 - Enhanced Drug Utilization Review
 - Support your pharmacists in making good faith decisions
- In addition, select District Leaders:
 - Are required to visit their exception stores
 - Store visits should be completed by at least a RxS and DLPM who will complete FOC Pain Management Survey.
 - DLPM is required to submit the information from the store visit into the online FOC Pain Management Survey.
 - Recommendation: Complete 5 store visits/week

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Questions



Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Controlled Substance Action Plan

June 11, 2012

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

HIGHLY CONFIDENTIAL

WAGMDL00066617



Agenda

- Overview
- Review updated policies & procedures
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Overview

- Due to recent action taken by the DEA, select policies and procedures have been updated to ensure our pharmacists and stores are compliant when dispensing controlled substances.
- Corresponding enhancements include:
 - Update to the Good Faith Dispensing Guidelines
 - Revised Ordering Procedures for Controlled Substances
 - Drug Utilization Review Enhancements

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



- Overview
- Review updated policies & procedures
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Good Faith Dispensing Policy



- The Good Faith Dispensing Policy has been updated to provide Pharmacists additional resources for making decisions when dispensing controlled substance prescriptions.
- The following components have been updated:
 - Prescription Validation Procedures
 - Roles and Responsibilities of each pharmacy team member
- Pathway to Good Faith Dispensing Policy
 - *Storenet > RxOps > Pharmacy Policies and Procedures > Filling Prescriptions > Controlled Substance Prescriptions and Good Faith Dispensing*

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Validation Procedures for Good Faith Dispensing (GFD)



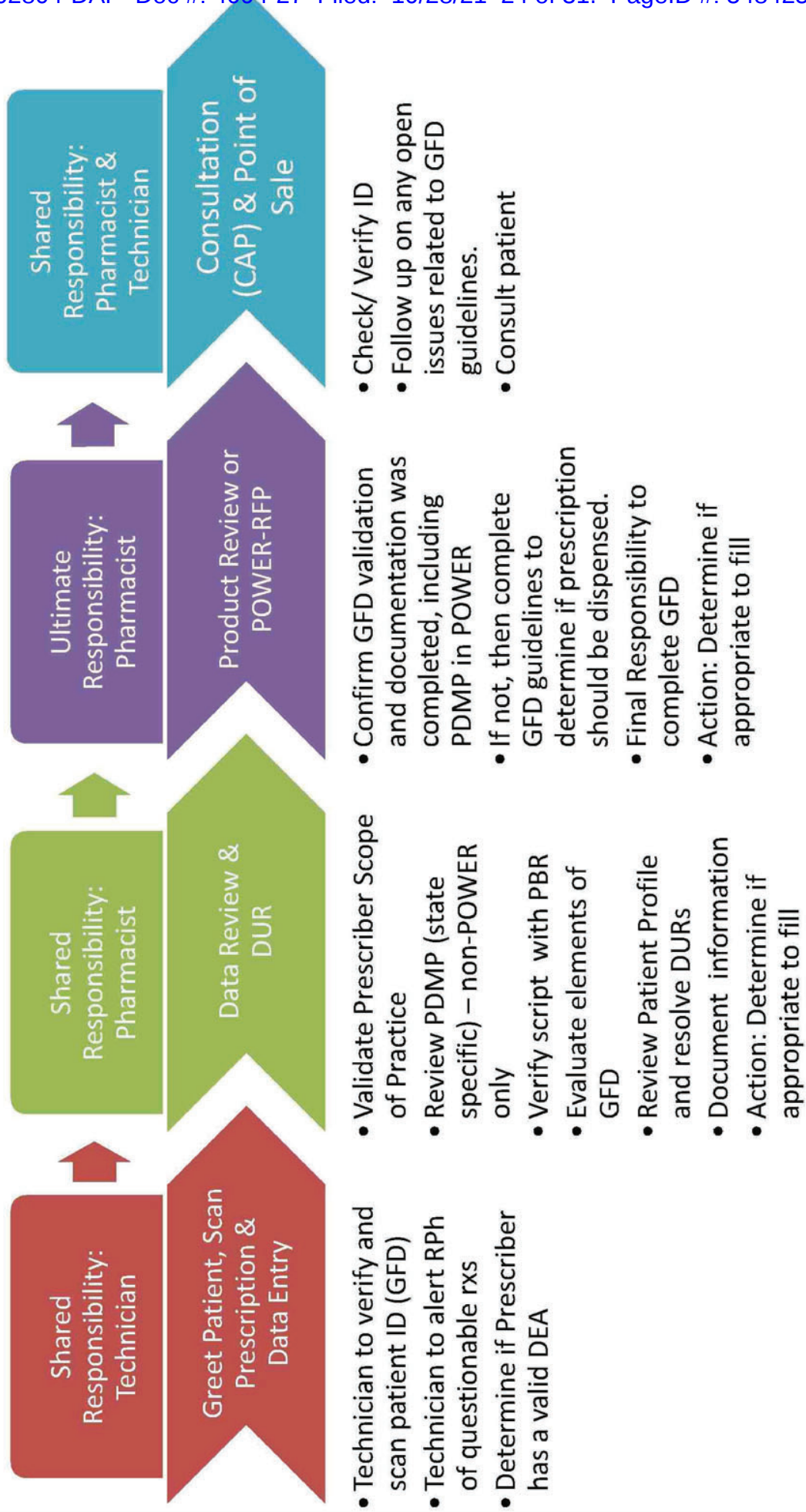
Validation Tools

- 1. Patient ID**
 - Verify and Document ID if the patient doesn't have a relationship with the pharmacy
 - Follow state specific guidelines
- 2. Prescriber**
 - Verify Prescriber DEA number
 - Use DEA website if necessary
- 3. PDMP**
 - Utilize to obtain additional information to help determine validity of prescription
 - State specific
- 4. Data/DUR Review**
 - Review patient profile to resolve and document any associated DURs
- 5. Evaluate GFD guidelines**
 - Ensure usual course of professional practice
 - Verify noticeable trends with prescribers or patients
 - Verify prescriptions have not been altered or forged

Actions after Validation

- 6. Document**
 - Document all efforts used to validate good faith dispensing
- 7. RPh Action**
 - Determine how to proceed after using GFD guidelines:
 - Dispense
 - Not valid to dispense
 - Refuse to dispense
- 8. Notify DEA**
 - Notify local DEA office of refusal to fill if prescription is forged, altered or issued outside of usual course of professional practice

Everyone Plays a Role in the GFD Process



Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Ordering Controlled Substances



- Controlled Substance Ordering procedures have been updated to minimize risk.
- The following changes have been implemented:
 - Manual Orders to DC and Cardinal will no longer be accepted.
 - All Controlled Substance orders will be required to be processed through SIMS, including requests for specific manufacturers
 - *StoreNet > SIMS > Rx Inventory Management > Ordering > Controlled Drugs > Ordering Specific Manufacturer*
- Maximum Ordering Quantities
 - Store specific order limits
 - Chainwide order limits
- Orders exceeding the maximum quantities
 - Pharmacy Managers must contact their Pharmacy Supervisor for approval
 - If approved, the Pharmacy Supervisor will approve and submit the order

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Enhanced Drug Utilization Review



- A DUR enhancement has been made to alert pharmacists to review a patient's profile and utilize Good Faith Dispensing procedures when dispensing select controlled substances.
 - A **Major DUR** will flag when a patient has been prescribed medications, that in combination, have a high potential for abuse.
 - The following message will appear to the pharmacist: *"A strong association appears to exist between illicit use of Carisoprodol in combination with narcotic analgesics such as oxycodone and benzodiazepines such as alprazolam....."*
- The pharmacist completing the DUR must then adhere to the Good Faith Dispensing policy.

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



- Overview
- Review updated policies & procedures
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.



Future Enhancements

- We will be developing additional tools to assist in our compliance efforts. These include:
 - Index Reporting
 - Updated Inventory Dashboard
 - Additional inventory system controls (SIMS)
 - Controlled Substance investigation process
 - IT enhancements to streamline current manual processes
 - Good Faith Dispensing PPL Policy Acknowledgement and PPL Training



- Overview
- Review updated policies & procedures
- Future Enhancements
- Call to action and next steps

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Call to Action



- Store leadership are to:
 - Reinforce the following information with all pharmacy team members:
 - Updated Good Faith Dispensing Policy
 - Updated controlled substance ordering procedures
 - Enhanced Drug Utilization Review
 - Support your pharmacists in making good faith decisions

Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.

Questions



Information is confidential and proprietary to Walgreen Co. ©2012 Walgreen Co. All rights reserved.